



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
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ATLANTA, GEORGIA 30303-8960

4-APB-APT

SEP 01 2006

Rob Raney, P.E.
Director
Pollution Control Division
Metro Public Health Dept.
311 23rd Avenue, North
Nashville, TN 37203

Dear Mr. Raney:

This correspondence is being sent to provide you with an official final copy of the Environmental Protection Agency (EPA) Region 4 report, which was completed as a result of the EPA Title V and New Source Review (NSR) program evaluation the week of December 5, 2005, in Nashville, Tennessee (see Enclosure). The purpose of this program review was to evaluate the status and the ability of the Nashville/Davidson County Metro Public Health Department, Pollution Control Division (PCD) to carry out the duties and responsibilities required to effectively run the title V and NSR programs, as well as find out how EPA can best assist the PCD in meeting these commitments.

I would like to thank you and your staff for your cooperation throughout the evaluation. Your staff responded to the questionnaires and provided all requested material in a timely and professional manner. In addition, I commend you on the effective implementation of both the title V and NSR programs. Both programs are operating at a very high level of proficiency. These programs are important tools to implement measures protecting air quality for the citizens of Nashville/Davidson County. We appreciate your efforts to ensure that the PCD has effective air programs in Nashville/Davidson County and look forward to continuing to work closely with the PCD to maintain high quality title V and NSR programs.

If you or your staff have any questions regarding the report, please do not hesitate to contact Randy Terry of the EPA Region 4 staff at (404) 562-9032.

Sincerely,

G. Alan Farmer
Acting Director
Air, Pesticides and Toxics
Management Division

Enclosure



Nashville/Davidson County Title V and New Source Review Program Review

The U.S. Environmental Protection Agency (EPA) Region 4 committed to conduct detailed title V and New Source Review (NSR) program reviews for all state and local programs that have at least 10 title V major sources within their jurisdiction. These evaluations also include a review of the title V fees collected and billed annually. This commitment results from an agreement between the EPA Office of Air and Radiation and the EPA Office of Inspector General, which required EPA to conduct title V program evaluations of all state and local programs with authority over at least 10 title V sources. EPA Region 4 decided, in addition to title V, to use this opportunity, when applicable, to evaluate the NSR programs at each of the state and local programs. The program reviews are to be completed by the end of Fiscal Year 2006. The Nashville/Davidson County Metro Public Health Department, Pollution Control Division (PCD) program review was conducted the week of December 5, 2005, in Nashville, Tennessee. Prior to EPA's arrival, EPA mailed copies of the title V and NSR questionnaires to the PCD to fill out. Upon EPA's arrival at Nashville office, EPA provided the PCD with a list of title V source files that were to be reviewed as part of the evaluation. EPA spent the first day reviewing the title V files and discussing the responses to the title V questionnaire with PCD staff. The following day was used to complete the review of the permit files and to discuss the NSR questionnaire. The following parties attended the title V questionnaire discussion: Randy Terry (EPA Region 4), Brandi Jenkins (EPA Region 4), Daphne Wilson (EPA Region 4) and Rob Rainey (PCD), John Finke (PCD).

Nashville/Davidson County Title V Program Review

1. Program Review

The PCD's organizational structure for air permitting resides at the office in Nashville, Tennessee. All title V permits for the Nashville/Davidson area, are processed in the Nashville office. Separate program evaluation reports will be written covering the Tennessee Department of Environment and Conservation (TDEC), Chattanooga-Hamilton County, Knox County and Memphis-Shelby County title V programs.

The headings in the title V portion of this report duplicate the headings in the title V program review questionnaire administered during the visit.

EPA appreciates the PCD's efforts to aid the evaluation process by providing an answered copy of the program review questionnaire prior to the meeting. For many questionnaire items, the answers provided by the PCD are more detailed than indicated in the summary discussion below. The answered questionnaire from the PCD will be on file at EPA Region 4 for reference.

A. Title V Permit Preparation and Content

The PCD has processed 100 percent of their initial title V applications. All of the applications submitted by the sources during the initial round of title V permit issuance lacked sufficient information to create the title V permit. The primary reasons for the deficient applications were confusion from the sources over the transition from individual permits to title V permits and a failure by the sources to provide enough information within their title V applications. To eliminate these delays, the PCD conducted multiple meetings with the sources and their consultants. Additionally, PCD mailed letters, to sources, requesting additional information to complete the initial applications. PCD also utilized these letters as a method to explain the necessary information to ensure the applications received for modifications and renewal were of a higher quality.

The PCD handled all applications in a timely manner and were able to avoid a significant amount of time passing between application submittal and drafting a permit. The PCD requires that all sources be in compliance prior to the issuance of a permit. On occasions when a source is out of compliance, the PCD may delay permit issuance until the source has returned to compliance or the PCD may include a compliance plan in the title V permit to bring the source back into compliance.

Since the implementation of the title V program, the PCD has improved in their permit writing and processing time as their staff has gained experience. Additionally, continued attendance at the title V workshops and annual meetings has helped the PCD to maintain a high level of proficiency in permit writing. In order to quality assure the title V permits prior to issuance, each new draft permit is compared to the most recent draft permit that underwent EPA review. The PCD uses the comparison to ensure that the new permits contain all the changes that have come

about through EPA suggestion, as well as the overall evolution of the permits. In addition, permits are reviewed by the Director prior to the issuance of a draft permit.

The PCD has made specific efforts to streamline their permit issuance by combining all applicable standards into the most stringent standard for a given pollutant. For example, the 10 percent opacity visible emission standard in the permit will comply with the 10 percent opacity standard outlined in New Source Performance Standard as well as the 20 percent opacity standard outlined in local regulations.

The PCD prepares a statement of basis (SOB) for each title V permit processed, incorporating the requirements of 40 CFR part 70.7(a)(5). The purpose of the SOB is to address all applicable requirements, any streamlining contained within the permit, identification of any deviations in monitoring requirements and the rationale behind these deviations. PCD permit writers attend the title V annual workshop and any available training to ensure that they prepare adequate SOBs.

Regarding the overall strengths and weakness of the format of title V permits, the PCD believes one strength of the format is the ability to streamline the permits as much as possible while incorporating all the necessary requirements. Once the PCD has streamlined the permits, they organize the title V permits in a format very similar to the existing local operating permits which the source was previously accustomed.

B. General Permits

The PCD does not issue general permits.

C. Monitoring

In order to ensure that its operating permits contain adequate monitoring, the PCD reviews each permit and evaluates them on a case by case basis to ensure practical enforceability.

Additionally, PCD permit writers evaluate on a case by case basis the need for additional monitoring not covered by the underlying requirements. To ensure that their permit writers are capable of making such determinations, PCD permit writers have attended training courses such as those offered by Air Pollution Training Institute or other EPA offices.

D. Public Participation and Affected State Review

The PCD utilizes the "Tennessean," which is the most widely circulated newspaper in the Nashville/Davidson County to give general public notice of title V permitting actions. The cost of publishing public notices in the newspaper has averaged \$700 and is paid for by the PCD. To reduce cost, if more than one notification is being planned over a given period of time, the notices may be combined into one publication. The PCD does not have a mailing list because they have never received any requests for the creation of one nor have they had the public show any interest in one. Instead of focusing on creating a mailing list, the PCD believes the newspaper has been an effective way of keeping the public informed of title V actions. Although

public interest may be limited, 40 CFR part 70.7(h)(1) clearly states that public notice be given "to persons on a mailing list developed by the permitting authority...." The PCD should look into developing a mailing list and create a mechanism to allow interested parties to request to be on the mailing list to avoid the possibility of having a petition granted due to the lack of one. On January 20, 2006, the U.S. Court of Appeals for the Eleventh Circuit (the "Court") granted a petition for review with respect to the issue of failing to use a mailing list. *Sierra Club v. EPA*, 11th Cir., No. 03-10262, Jan. 20, 2006

On occasions when significant community interest is anticipated, the PCD has published the date of the public hearing within the public notice. Of the sixteen title V sources in Nashville/Davidson County, the PCD has received citizen comments on one source (Nashville Thermal). The PCD provides copies of the public notice, draft permit, and SOBs to anyone that requests it. In cases where the information contained in the public notice needs to be revised, the permit must be re-noticed.

The PCD does not reach out to communities beyond the traditional public notification process, but when they are aware of high public interest, they schedule the public hearing in advance and publish the date of the hearing within the public notice. If a public hearing is not scheduled at the time of the public notice and one is requested during the public comment period, PCD will schedule a public hearing. The only comments PCD has received on a title V source were in regard to a source no longer in operation and did not result in any revisions to the permit. The Metro Public Health Department has a public information officer that interacts with the media, but the PCD permitting staff handles all matters dealing with public participation. The PCD does not public notice in any language other than English.

Upon request, copies of any additional information relative to the permit action are provided at a minimum charge of 10 dollars, which includes the first 10 pages. Any additional pages are billed at a rate of 50 cents per page. All title V documents are available for inspection by the public at the PCD offices, daily, between the hours of 8:00 am and 4:30 pm. Information available for public access includes any permit, application, SOB, compliance report or compliance certification.

The PCD has not received any requests to extend the comment period deadline. Over the years, the PCD has not noticed an increase in the percent of permits that receive public comments. Only one source in the Nashville/Davidson area received comments and that source was a municipal waste combustor that is no longer operational. The PCD noted that they have had a community group, but not an environmental justice (EJ) community, to comment on a permit for a source that is no longer in operation. However, no one actively comments on title V permits. The PCD works closely with the sources prior to public notice minimize the potential for permittee comments. On the occasions that PCD receives comments from a source, they are typically administrative changes or typos.

The PCD notifies all affected states of draft permits by email. The State of Tennessee and the Commonwealth of Kentucky qualify as "affected." The PCD has never received comments from

an affected state, nor have they ever provided comments to another program as an affected "state."

E. Permit Issuance/ Revision/ Renewal

The PCD has issued 100 percent of their initial title V permits and has generally been able to process title V revisions within the time frames allotted by Part 70. Efforts by the PCD to streamline the processing of title V revisions include the use of concurrent review. To track permit revision applications as they move through the permitting process, all requested modifications to title V permits are tracked along with all other minor sources in a NSR database. A separate title V log is also used to track the type of modifications requested.

The PCD has issued 15 out of 16 title V renewal permits and three second renewal permits. Each source was contacted prior to their renewal due date to ensure that the renewal applications would be submitted. As a result of PCD early contact with the facilities, 88 percent of their renewal applications were found to be timely and complete. The PCD has reduced the time for processing renewals to between two and four months. One way the PCD has been able to reduce the time frame for processing the permits is the use of a streamlined application form. The streamlined approach does not apply to sources at a facility that has been modified during the permit term. Any source that has made several permit modifications during the permit term is required to submit a complete application to ensure that a complete document is available for public review. Compliance assurance monitoring plans have been included in renewal applications, where applicable.

F. Compliance

The PCD requires any deviations that result in excess emissions to be reported within 10 days. Deviations are not necessarily considered as violations. Each deviation report must contain the probable cause of the deviation, corrective actions taken, and the magnitude and duration of the deviation. Following the receipt of a deviation report, the PCD reviews the report and evaluates a course of action on a case-by-case basis. The PCD reviews 100 percent of all deviation reports, semi-annual monitoring reports, and annual compliance certifications. Upon receipt of a semi-annual monitoring report or an annual compliance certification, PCD staff reviews the report and determines if enforcement action for the identified violations should be pursued.

G. Resources and Internal Management Support

The PCD establishes its title V fee based on emissions volume. Currently PCD title V fees are \$28.00/ton based on allowable emissions, except for CO, with a 2000 ton cap. Title V revenue are processed and tracked within an account separate from the general fund account. This system allows financial reports for management oversight and accurately accounts for title V revenue as well as expenditures.

The PCD has one permit writer position, and he divides his time between title V enforcement activities, NSR for minor, synthetic minor and major sources, dispersion modeling for NSR to

protect the National Ambient Air Quality Standard (NAAQS) and PSD increment, and stack test observation. Title V permitting accounts for approximately 10-15 percent of the permit writer's time. The PCD has had minimal employee turnover in part due to the ability to offer competitive salaries and a career ladder for engineers. The PCD management reviews all title V permits prior to permit issuance and reviews quarterly implementation reports prior to submittal to keep abreast of the status of title V permit issuance.

The PCD permit writer is afforded opportunities for EPA and State training. Training courses include online courses, telecourses, and internal training. The training has included how to develop periodic and sufficiency monitoring in permits, enforceable permit terms and conditions as a practical matter and writing a SOB. PCD has requested the EPA continue to provide funding for training.

The PCD has not developed an EJ strategic plan, but does have an in-house coordinator charged with oversight of EJ related activities. EPA has volunteered to provide the PCD with information on EJ training courses available. The PCD permit writer does not have access readily available to demographic information necessary for EJ assessments, but can acquire it via the health department.

H. Title V Benefits

The PCD believes that significant benefits have been gained as a result of the title V program. The PCD believes that since they began to implement the title V program, the sources within Nashville/Davidson have gained better awareness of their compliance obligations. Also, title V has resulted in clarity and enforceability of NSR permit terms, and better documentation of the basis for applicable requirements. Other benefits of the title V program and the title V fee revenue include better training and a stable funding source despite fluctuations in other sources of fundings.

Program Highlights

1. The PCD has issued 100 percent of their initial title V permits and 15 out of 16 renewal permits and has begun to issue second renewal permits. The PCD's ability to complete the issuance of the renewals so quickly allows them the time to focus on other issues such as enforcement, compliance, and annual inspections.
2. The PCD's commitment to maintain a quality staff with minimum turnover is evidenced by their experienced staff and the ability to offer competitive salaries assist in retaining staff.
3. The PCD has been able to process their permit revisions well within the part 70 time frames.

4. The PCD's title V revenues are contained in an account exclusively for title V, which allow the title V expenses to be easily tracked.

Suggested Improvements

1. The PCD should initiate training of their staff on understanding and identifying any potential EJ communities that may be affected by permitting decisions.
1. The PCD may want to reconsider their position on re-opening the entire permit when processing significant modifications. Re-opening the entire permit subjects the source to an unfair second round of potential public comments and may require the permitting agency to spend unnecessary time addressing comments on portions of the permit unchanged since the previous public notice.
2. The PCD should create a link on their website for public participation that connects directly to their regulations that cover public participation. (Regulation No. 13 and Chapter 10.56)
3. The PCD needs to develop a mailing list to provide notice to interested parties during the public notice period. 40 CFR part 70.7(h)(1) clearly states that public notice be given "to persons on a mailing list developed by the permitting authority...." Additionally, on January 20, 2006, the U.S. Court of Appeals for the Eleventh Circuit (the "Court") granted a petition for review with respect to the issue of failing to use a mailing list. (*Sierra Club v. EPA*, 11th Cir., No. 03-10262, Jan. 20, 2006).
 - The PCD has stated that they are agreeable to use of a mailing list, should the public ever request to be included on a mailing list.

2. Permit Reviews

EPA Region 4 staff conducted an administrative review of seven title V files. The files that were reviewed represented a cross-section of the types of industries permitted in Nashville-Davidson County. The permitting authority has files for the following categories: 1) Compliance and Monitoring; 2) Title V permit file; 3) Construction and Operating permit file and; 4) Correspondence file. The files were well organized and easy to maneuver. Each section of the files is clearly marked as to the contents. The title V permit file included all information related to the title V permit, statement of basis, draft permit, public notice, title V application, and final permit. Any comments that were received during the public comment period or from EPA are located in the correspondence file.

Suggested Improvements

1. EPA suggests the PCD include the proof of publication for the public notice (i.e. copy of the actual newspaper article) within the permit file.

2. The SOB should include more information about the monitoring rationale or justification for compliance methods that are in the permit. Providing more information in the SOB will help answer questions that may arise in the review of the title V permits. The SOB should be considered a stand-alone document and enhance the completeness of the permit record. If needed, EPA will provide the necessary training on SOB development.

Nashville/Davidson County New Source Review (NSR) Program Review

On December 7, 2005, EPA Region 4 conducted a review of the NSR permit program administered by the Nashville/Davidson County Metro Public Health Department, Pollution Control Division (PCD). The NSR program review consisted of administering a questionnaire developed for EPA's national NSR program review project. Since the PCD issues very few major NSR permits and since Region 4 has reviewed the only major NSR permit processed by the PCD in recent years, no major NSR permits were evaluated as part of the on-site review. Region 4 did, however, review one minor NSR permit.

The primary EPA staff person conducting the review was Jim Little from Region 4's Air Permits Section. The PCD's primary participants were Rob Raney and John Finke.

The PCD has a SIP-approved NSR program that is operated under a Certificate of Exemption from the Tennessee Department of Environment and Conservation (TDEC). (The Certificate is renewed every two years.) The PCD therefore has authority to issue both major and minor NSR permits.

Davidson County is designated as a nonattainment area for the 8-hour ozone national ambient air quality standard (NAAQS). However, the County has been approved for early action compact (EAC) status. In accordance with EAC approval, the effective date of the nonattainment designation has been deferred. The current deferral is until December 31, 2006. Therefore, the PCD has not needed to establish 8-hour ozone major nonattainment NSR permitting requirements. Accordingly, program review questionnaire items pertaining to major NSR nonattainment were not covered.

The PCD's organizational structure for air permitting consists of the central office staff in Nashville. All major and minor NSR permits are processed in the Nashville office. The PCD's permitting jurisdiction covers all of Davidson County.

In March 2006, the PCD adopted NSR rule revisions pursuant to EPA's December 2002 NSR rule revisions. Since the NSR program review discussed in this report took place prior to 2006, it covered only the PCD's administration of NSR rules in effect prior to the March 2006 adoption of NSR rule revisions. Future discussions between the PCD and EPA Region 4 should prove beneficial as both agencies gain experience with the NSR rule revisions that have taken effect in Davidson County.

As an appreciated aid to EPA, the PCD provided a copy of the program review questionnaire annotated with the PCD's answers. For many questionnaire items, the answers provided by the PCD are more detailed than indicated in the summary discussion below. The annotated questionnaire from the PCD will be on file at EPA Region 4 for reference if needed.

The headings in the following report duplicate the headings in the NSR program review questionnaire administered during the visit.

Overview of New Source Review (NSR) Permitting Program

A. NSR Permits

Major and minor NSR permits are logged in an electronic database. The database allows tracking of test requirements, permit renewal, etc.

In fiscal year 2005, the PCD issued no PSD permits and 79 minor NSR permits. From the time that a permit application is deemed complete, the average period for permit issuance is three to six months for PSD permit issuance (based on PCD's limited experience with PSD permits) and two months for minor NSR permits.

B. Staff and Training

The PCD has three staff members with NSR permitting responsibilities. NSR staff training consists largely of on-the-job training and EPA workshops. The PCD expressed interest in receiving additional NSR permitting training from EPA and suggested a joint training workshop with TDEC.

C. NSR Implementation

The PCD follows EPA's NSR program guidance and policy as direction for implementing NSR procedures.

D. Public Participation

The PCD issues a public notice for any physical change or change in the method of operation that result in an increase in allowable emissions. Changes to major or synthetic minor permits that alter monitoring or recordkeeping requirements are also sent to public notice. The PCD is researching the possibility of developing a website for permit notifications that would include posting of draft NSR permit notifications.

A public hearing is held prior to construction permit issuance for a new major stationary source or major modification, if requested. Other requests, later in the process, for a public hearing may be honored on a case by case basis, but they would not delay the issuance of a permit to a minor source.

E. Program Benefits

The PCD believes that the NSR program provides an incentive for sources to reduce emissions below major source levels and helps sustain good air quality.

Major NSR Permitting

A. Applicability

The PCD rules contain a general definition of "major stationary source" that is more stringent than the EPA definition of major stationary source for emissions of sulfur dioxide, carbon monoxide, particulate matter, and volatile organic compounds. For PSD applicability purposes, this general definition is superseded by the PCD's rules for PSD. The PCD considered changing or deleting the definition of major stationary source at one time but was advised by EPA Region 4 that such a change would require a detailed equivalency demonstration and might require a protracted period for approval.

When assessing whether two or more non-contiguous facilities owned by the same company should be considered one source for applicability purposes, the PCD takes into account the separation distance between the facilities. The PCD does not have a bright line separation distance criterion. The separation distance is evaluated in combination with the degree of interdependence among the facilities.

When estimating emissions, a source owner is required to use the best information available for the determination of actual and allowable emissions. When no other information is readily available, AP-42 emissions factors have been deemed acceptable for permitting purposes (not for NSPS or MACT compliance purposes).

Condensable particles are taken into account for NSR applicability purposes.

In discussing fugitive emissions, the PCD noted that some permits require fugitive emissions controls such as work practice standards to reduce fugitive dust emissions from quarry stock piles and roadways.

B. Prevention of Significant Deterioration (PSD) Permitting

The PCD has only processed one PSD permit in the last five years. Despite the lack of extensive PSD permitting experience, the PCD representatives present during the evaluation interview were knowledgeable of PSD permitting requirements and should be able to handle future PSD permitting actions successfully. In addition, EPA Region 4 is available to assist the PCD as needed with future PSD permit applications. The PCD indicated that future projects requiring PSD review are unlikely because only four major PSD sources exist in the County.



C. Nonattainment Major NSR Permitting

[Note: As explained above, program review questionnaire items pertaining to major NSR nonattainment are not relevant and were not covered.]

NSR Avoidance


A. RMRR Exemption

The PCD is aware of the procedures required for a routine maintenance, repair, and replacement (RMRR) exemption assessments and has made one formal RMRR assessment in the last five years (the assessment for Visteon).

B. PCP Exemption

[Note: Because the pollution control project (PCP) exemption rules and policies have been vacated by the U.S. Court of Appeals for the District of Columbia Circuit as of June 24, 2005, no questions about PCP exemptions were asked.]

C. Circumvention/Aggregation



The PCD watches for the possibility of circumvention. With so few sources, the possibility of circumvention can be tracked closely. As an example, one source owner recently proposed to add emergency generators at an existing facility - four generators at one time and two other generators at a later time. The PCD told the source owner that all six generators would be viewed as part of one project.

D. Synthetic Minor Permit Limits

The PCD structures synthetic minor permits to facilitate compliance. Compliance with emissions limits is assessed by on-site inspections and review of annual emission inventory reports.

E. Relaxation

The PCD is knowledgeable of relaxation regulatory provisions. The types of actions especially considered as potential relaxation actions are actions that a source was previously capable of making but that were intentionally restricted for major NSR avoidance purposes.

Minor Source Construction Permitting Program

The PCD rules require a best available control technology (BACT) evaluation for minor source construction permits involving increases in emissions of volatile organic compounds (VOC). The top-down BACT procedure is required for minor source VOC BACT unless the emissions increase is small, in which case a less stringent evaluation would suffice. Minor source VOC BACT often results in enforceable work practice requirements.

EPA reviewed one minor NSR permit as part of the NSR program evaluation. In this permit, the PCD established emissions limits and operating conditions for the purpose of confirming PSD avoidance. EPA found this permit to be well written and thorough, with detailed conditions adequate for practical enforcement of PSD avoidance requirements.

[Note: Also see comment below on minor source modeling.]

Modeling

A. PSD Modeling

The PCD requires PSD permit applicants to prepare a modeling protocol prior to submitting modeling results. Because the PCD does not process many PSD permit applications, it was recommended that the PCD send each modeling protocol to EPA Region 4 so that EPA can provide its modeling experience as a resource to the PCD.

The PCD is aware that AERMOD is becoming the preferred dispersion model for NSR permitting, but the PCD engineer responsible for modeling evaluations has not yet received training in use of AERMOD. EPA will provide training materials.

For cumulative impact modeling, the PCD provides an inventory of sources for modeling purposes. Included with the inventory is an identification of sources in the general site area that do not have to be included in modeling. The PCD would request an inventory from TDEC (and perhaps from Kentucky) if a PSD modeling analysis requires consideration of emissions sources located outside Davidson County. The PCD also provides background concentrations that are added to modeling results for assessment of compliance with ambient air quality standards.

Unlike most reviewing authorities, the PCD has local ambient air quality standards (LAAQS) that are applicable in addition to NAAQS. Specifically, the PCD has adopted into its regulations the Tennessee ambient air quality standards for gaseous fluorides (as hydrogen fluoride). So long as these gaseous fluoride ambient standards remain in effect, compliance with the standards must be demonstrated as part of PSD permitting for projects that involve gaseous fluoride emissions.

B. Nonattainment Major NSR Modeling

[Note: Major nonattainment NSR modeling is not applicable in Davidson County at this time.]

C. Minor Source Modeling

Projects requiring a minor source construction permit undergo a modeling evaluation to assess compliance with NAAQS and PSD increments. The evaluation is conducted by PCD staff rather than by the applicant. The only source modeled is the new or modified source requiring the permit. (Cumulative modeling is not performed.) Compliance with NAAQS is evaluated by adding a conservative background concentration to modeling results.

D. Increment Tracking

Increment consumption tracking is done on an informal basis. A formal cumulative analysis would only be conducted if a PSD permit application were received. Emissions source data (including stack parameters) are available in PCD's database if needed for increment tracking purposes.

NSR-related Recommendations and Suggestions

The following NSR-related recommendations and suggestions are largely a restatement of previous comments:

1. The relatively few number of PSD permitting projects reviewed by the PCD may not provide sufficient on-the-job experience for PCD staff to remain current in all aspects of NSR regulatory requirements. The PCD expressed an interest in receiving additional NSR training from EPA.
2. Recent changes to EPA's Guideline on Air Quality Models will necessitate greater use of the AERMOD model. PCD's modeler may need training to become adept in use of the model if needed for future projects.
3. So long as ambient air quality standards for gaseous fluorides remain in effect, compliance with the standards must be demonstrated as part of PSD permitting for projects that involve gaseous fluoride emissions.
4. If not already done, Region 4 recommends that the PCD proceed to develop a website for permit notifications that would include posting of draft NSR permit notifications.

Conclusion

At the conclusion of the onsite portion of the Title V and NSR program reviews, Region 4 personnel met with PCD officials to conduct an exit interview. During this exit interview Region 4 shared the findings of the review and laid out the next steps for completion of the final report. Personnel in attendance from EPA Region 4 were Randy Terry, Jim Little, Brandi Jenkins, Kay Prince and Daphne Wilson. PCD officials in attendance included Rob Rainey, John Finke. Brent Hagar of the Metro Public Health Department also attended.

Overall, EPA believes that the PCD is operating both the title V and NSR programs at a high level of proficiency and looks forward to working with the PCD in the future.